

SCOTT N. SCHOOLS (SCBN 9990)
United States Attorney

MARK KROTOSKI (CASBN 138549)
Chief, Criminal Division

DEREK R. OWENS (CASBN 230237)
Special Assistant United States Attorney

CATHERINE BLOOM
Law Clerk

450 Golden Gate Avenue, 11th Floor
San Francisco, California 94102
Telephone: (415) 436-7200 (San Francisco)
Fax: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KANESHA EIA BOYD,

Defendant.

CR No.: CR No. 07-0012 MEJ

STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME

On February 27, 2007, the parties in this case appeared before the Court and stipulated that time should be excluded from the Speedy Trial Act calculations from February 27, 2007 to March 29, 2007 for effective preparation of defense counsel to review the discovery for the case and consult with the defendant. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of both defense counsel and the United States, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties also agreed that the ends of justice served by granting such a continuance outweighed the best interests of the public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(8)(A).

SO STIPULATED:

SCOTT N. SCHOOLS
Interim United States Attorney

03/08/07
DATED: _____

/s/ Derek R. Owens

DEREK R. OWENS
Special Assistant United States Attorney

03/08/07
DATED: _____

/s/ Steven Kalar

STEVEN KALAR
Attorney for Ms. Boyd

As the Court found on February 27, 2007, and for the reasons stated above, the Court finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial and that time should be excluded from the Speedy Trial Act calculations from February 27, 2007 to March 29, 2007 for effective preparation of defense counsel and the United States. See 18 U.S.C. §3161 (h)(8)(A). The failure to grant the requested continuance would deny counsel reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

SO ORDERED.

DATED: March 12, 2007

